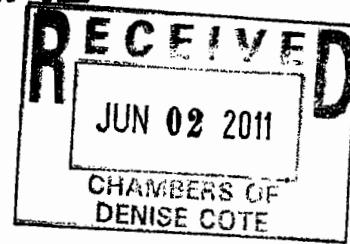


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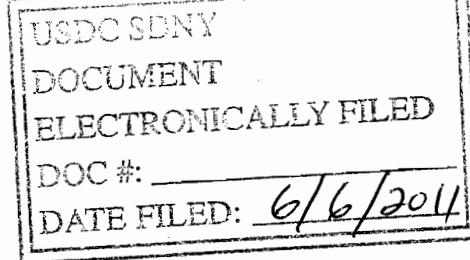


MEMO ENDORSED

By Hand Delivery

Honorable Denise Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007-1312

June 2, 2011



Re: *Calderon-Cardona et al v. Deutsche Bank Trust Company Americas, S.D.N.Y.*
Docket No. 11 CV 3288 (DLC) and related judgment enforcement actions filed
under Docket Nos. 11 CV 3283, 3284, 3285, 3286, 3289, 3290, 3291 and 3292

Dear Judge Cote:

We represent Deutsche Bank Trust Company Americas ("DBTCA").

By order dated May 31, 2011, the Court scheduled an initial conference in each of these related judgment enforcement proceedings on June 7 at 10:30 am. Because I am scheduled to attend a court hearing in Delaware on the morning of June 7, I write to request that the Court reschedule the conference.

In an effort to find proposed dates that are convenient for the other counsel involved, we suggested eight alternative dates in June (June 8-9, 13-14, 16, 21-23). Of these dates, the only date on which no party appears to have a conflict is June 23 before noon or after 3:30 p.m. Petitioner's counsel expressed a general objection to any delay of the conference, but did not claim any scheduling conflict that would prevent him from appearing on June 23.

Given that June 23 appears to be the only date on which the parties have no scheduling conflicts, we respectfully request that the Court reschedule the conference for that date, if it is convenient for the Court.

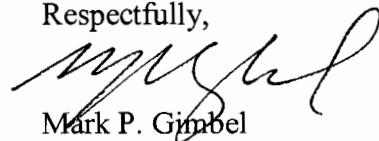
*The conference is adjourned to
July 7 at 2:00 pm.
Denise Cote
June 6, 2011*

COVINGTON & BURLING LLP

Honorable Denise Cote
June 2, 2011
Page 2

We greatly appreciate the Court's attention to this matter and regret any inconvenience the scheduling conflict may have caused.

Respectfully,



Mark P. Gimpel

cc: Robert J. Tolchin, Esq. (by e-mail)
Sharon L. Schneier, Esq. (by e-mail)
J. Kelly Nevling, Esq. (by e-mail)
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